

IN THE UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

KAZI MANAGEMENT	:	Civil Action No. 4:20-cv-00924
SAINT CROIX, LLC and ZUBAIR	:	
KAZI,	:	
Plaintiffs	:	
	:	
v.	:	
	:	
SANTIAGO GARCIA GUTIERREZ,	:	JURY TRIAL DEMANDED
UNIVERSAL INVESTMENTS &	:	
TRADING, LLC, and UNITED FUEL	:	
SUPPLY SA, LLC, and JOHN DOE,	:	
Defendants	:	

**AFFIDAVIT OF SERVICE IN SUPPORT OF
DEFAULT JUDGMENT**

I, Forest Dean Morgan, Esquire, declare under penalty of perjury the following facts are true and correct to the best of my information and belief:

1. I am the Attorney for the Plaintiffs in this action.
2. A Complaint was filed herein on March 13, 2020.
3. I certify that Defendants Santiago Garcia Guitierrez (GUTIERREZ), Universal Investments and Trading, LLC (UIT), and United Fuel Supply SA, LLC (UFS SA) were properly served as set forth in Exhibit A, B, C, and D which are attached hereto and incorporated herein by reference.
4. No response has been served within the time allowed by law, nor has any defendant sought additional time to respond.

5. This Court entered a Default against Gutierrez, UIT, and UFS SA on September 8, 2020.



Forest Dean Morgan, Esquire

PA Bar # 203088

The Morgan Law Firm

PO Box 767

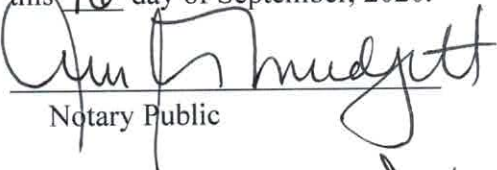
Hershey, PA 17033-0767

Tel: 717-220-4300

dean@fdeanmorgan.com

Attorney for Plaintiffs

Sworn to and subscribed before me
this 16th day of September, 2020.


Notary Public

My Commission Expires: Sept 23, 2021

Commonwealth of Pennsylvania - Notary Seal
ANN G MUDGETT - Notary Public
Dauphin County
My Commission Expires Sep 23, 2021
Commission Number 1117027

Exhibit A

B4 WEDNESDAY JULY 1, 2020

Los Angeles Times

LATIMES.COM

The fight for a 'good death' in racist society

[Death, once it] Arthur, who has been interviewed for print pieces and videos, made TV appearances and even performed death doula work. "But black people and people of color are so marginalized and so very important that other people see in this conversation."

The idea behind the doula death practice is to provide support and advocacy for people who are dying, and to help them prepare for death. Arthur, who has been interviewed for print pieces and videos, made TV appearances and even performed death doula work. "But black people and people of color are so marginalized and so very important that other people see in this conversation."

Death doulas in particular have been a topic in popular press in recent years, especially in the wake of the deaths of George Floyd and Breonna Taylor. A community death doula group in Los Angeles has more than 4,000 members. The Order of the Good Death doula group has been "labeled" by more than 100 people.

As a death doula, Arthur has spent a lot of time thinking about what a "good death" means — how people can live and die with dignity and respect. "I'm not a doctor or a nurse," she says. "I'm a doula. I'm here to support you and your family through the process of death and dying."

Arthur said "good death" is often synonymous with a white death. "The American dream is based on the white experience," she said. "For people of color, it's a different story."



AN A death doula, Alicia Fernandez, talks to a group of people in a room. She and others in the field recently led a public demonstration about the topic.

largely based on the values of white people. "I'm not a doctor or a nurse," she says. "I'm a doula. I'm here to support you and your family through the process of death and dying."

The medical industry, and the way it treats people of color, is a major issue for death doulas. "We're not just talking about death," she says. "We're talking about the way we live and the way we die."

Thomas Nguyen is a member of the Order of the Good Death. He is a death doula and a community organizer. "We're not just talking about death," he says. "We're talking about the way we live and the way we die."

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(CRIMINAL JUDICIAL)
Case Number (Criminal and Civil):
02-20-00024

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We are carrying so much right now, our burdens are different.

We are carrying so much right now, our burdens are different.

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Death row inmate at San Quentin dies in outbreak

(San Jose, from B1)
A death row inmate at San Quentin died in an outbreak of COVID-19, the state's top health official said.

The governor also said he is working to release as many inmates as possible to help reduce the state's prison population.

"We are working with many advocates in the state to help reduce the prison population," he said. "We are also working to release as many inmates as possible to help reduce the state's prison population."

He said the state will release as many inmates as possible to help reduce the state's prison population.

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San Jose's official said the inmate died of COVID-19, the state's top health official said.

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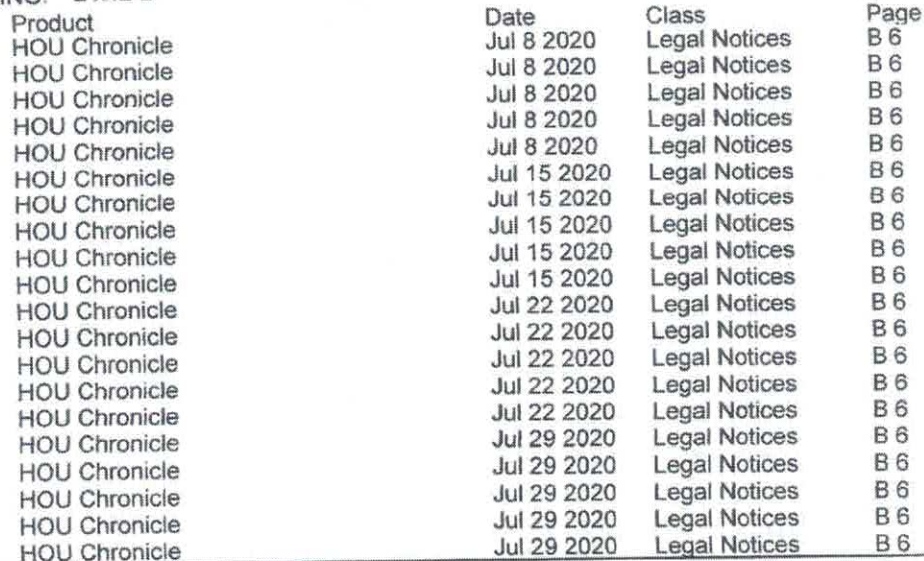
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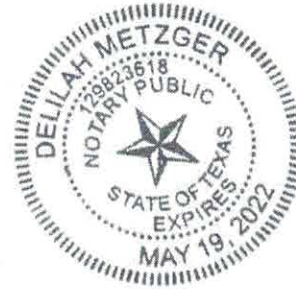
Exhibit B



Victoria Bond A/R Clerk

NEWSPAPER REPRESENTATIVE

Sworn and subscribed to before me, this 29th Day of July A.D. 2020



[Signature]

Notary Public in and for the State of Texas

United States District Court

For the
Southern District of Texas
Kazi Management St. Croix, LLC and Zubair Kazi
Plaintiff(s)

v.

Santiago Garcia Gutierrez, Universal Investments &
Trading, LLC, United Deal Supply, LLC and John
DOE

Defendant(s)

Civil Action No. 4:20-cv-00924

SUMMONS IN A CIVIL ACTION

To: (Defendant's name and address) Santiago Garcia

Gutierrez

1111 Caroline Street, Apt 2903

Houston, TX 77010

A lawsuit has been filed against you.

Within 21 days after service of this summons on you
(not counting the day you received it)—or 60 days if
you are the United States or a United States Agency,
or an officer or employee of the United States
described in Fed. R. Civ. P. 12 (a)(2) or (3)—you
must serve on the plaintiff an answer to the attached
complaint or a motion under Rule 12 of the Federal
Rules of Civil Procedure. The answer or motion must
be served on the plaintiff or plaintiff's attorney,
whose name and address are:

The Morgan Law Firm

Forest Dean Morgan, Esquire

151 W. Chocolate Ave, Suite 145

PO Box 787

Hershey, PA 17033

If you fail to respond, judgment by default will be en-
tered against you for the relief demanded in the com-
plaint. You also must file your answer or motion with
the court.

Date: April 29, 2020

David J. Bradley, Clerk of Court

/s/ R. A. Limon

Signature of Clerk or Deputy Clerk

Exhibit C

Attorney or Party without Attorney: Forest Dean Morgan, Esq. The Morgan Law Firm 151 W. Chocolate Avenue, Suite 145 PO Box 767 Hershey, PA 17033 Telephone No: 717-220-4300 FAX No: 717-585-6574		For Court Use Only	
Attorney for: Plaintiff		Ref. No. or File No.:	
Insert name of Court, and Judicial District and Branch Court: United States District Court For The Southern District Of Texas			
Plaintiff: Kazi Managmenet St. Croix, et al. Defendant: Santiago Garcia Gutierrez, et al.			
AFFIDAVIT OF SERVICE		Hearing Date:	Time:
		Dept/Div:	Case Number: 420CV00924

1. At the time of service I was at least 18 years of age and not a party to this action.
2. I served copies of the Summons in a Civil Action; Complaint; Correspondence; Order Permitting Substituted Service and Continuing the Pre-Trial Conference
3. a. Party served: Universal Investments & Trading, LLC
 b. Person served: Valerie Flurry, Person Authorized to Accept
4. Address where the party was served: Secretary Of State
 1500 11th Street, 3rd Floor
 Sacramento, CA 95816
5. I served the party:
 a. by **personal service**. I personally delivered the documents listed in item 2 to the party or person authorized to receive process for the party (1) on: Fri., Aug. 07, 2020 (2) at: 2:35PM
7. Person Who Served Papers: Fee for Service: \$200.50
 a. John M. Adams



1500 W. El Camino Avenue, #510
 Sacramento, CA 95833
 855-5VALPRO, Fax (866) 900-4665
 www.ValproAttorneyServices.com

8. I declare under penalty of perjury under the laws of the State of TEXAS and under the laws of the United States Of America that the foregoing is true and correct.

AFFIDAVIT OF SERVICE

John M. Adams)

morgan.30397

Exhibit D



The State of Texas
Secretary of State

2020-317990-1

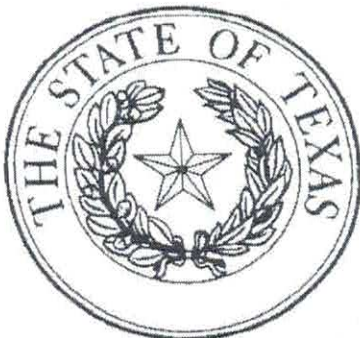
I, the undersigned, as Secretary of State of the State of Texas, DO HEREBY CERTIFY that according to the records of this office, a copy of the Summons in a Civil Action in the cause styled:

Kazi Management St. Croix LLC and Zubair Kazi VS Santiago Garcia Gutierrez,
Universal Investment and Trading LLC United Fuel Supply LLC and John DOE
United States District Court Southern District Of Texas
Cause No: 420CV00924

was received by this office on June 16, 2020, and that a copy was forwarded on June 22, 2020, by CERTIFIED MAIL, return receipt requested to:

United Fuel Supply SA LLC
C/O Santiago Garcia Gutierrez Registered Agent
1111 Caroline Street, Apt 2903
Houston, TX 77010

The RETURN RECEIPT was received in this office dated August 3, 2020, bearing signature.



Date issued: August 5, 2020

A handwritten signature in black ink, appearing to read "Ruth R. Hughes".

Ruth R. Hughes
Secretary of State
GF/vm



The State of Texas
Secretary of State

2020-317990-2

I, the undersigned, as Secretary of State of the State of Texas, DO HEREBY CERTIFY that according to the records of this office, a copy of the Summons in a Civil Action in the cause styled:

Kazi Management St. Croix LLC and Zubair Kazi VS Santiago Garcia Gutierrez,
Universal Investment and Trading LLC United Fuel Supply LLC and John DOE
United States District Court Southern District Of Texas
Cause No: 420CV00924

was received by this office on June 16, 2020, and that a copy was forwarded on July 6, 2020, by CERTIFIED MAIL, return receipt requested to:

Santiago Garcia Gutierrez
1111 Caroline Stret, Apt 2903
Houston, TX 77010

The RETURN RECEIPT was received in this office dated August 3, 2020, bearing signature.



Date issued: August 5, 2020

A handwritten signature in black ink, appearing to read "Ruth R. Hughs".

Ruth R. Hughs
Secretary of State
GF/vm